SHIFRIN & ASSOCIATES, inc.
Environmental Engineers

November 5, 2004

Mr. Jim Silver
U. S. Environmental Protection Agency
97 North Outer Road
Eureka, Missouri 63025

Re: The Huge' Company
7625 Page Boulevard
St. Louis (Pagedale), Missouri 63133

Dear Jim:

In accordance with our telephone conversation, enclosed is a Revised Remedial Action Work Plan for the subject property. We trust that the changes made address your comments and that you will be approving this document.

Brad Hiles asked me to let you know that his firm, Blackwell Sanders Peper Martin LLP, has been working with the Terminal Railroad over the last several weeks to obtain access to their right-of-way in order that this work may proceed. He hopes that they can bring this to conclusion shortly.

As indicated previously, upon receipt of your approval, we will submit a schedule, as well as providing you with notification of our planned start and working dates to allow you to be present on site, if you wish.

If you have any comments or questions or require further information, please advise.

Sincerely yours,

Walter G. Shifrin, P.E., President

WGS:mkh
Enclosures

cc: Mr. Thomas L. Huge'
Mr. Bradley S. Hiles, Esq.
Ms.Cathi K. Ponciroli, Esq.

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REMEDIAL ACTION WORK PLAN
THE HUGE' COMPANY
7625 PAGE BOULEVARD
ST. LOUIS (PAGEDALE), MISSOURI

Revised November 5, 2004

Background

In accordance with the "Revised Remedial Action Work Plan (Rev. 2)" prepared by Dames & Moore, the remedial action at the referenced site has been partially completed. The former stockpile of impacted soil, which was located west of the northwest corner of the Huge' building was removed and disposed off-site as a special waste. The standing water north of the east corner of the Huge' building was sampled for discharge characterization. Four (4) test pits were excavated to confirm the presence and location of the 12-inch clay pipe sewer, exiting the Huge' building, and the pipe, which is installed parallel to and south of the rail line.

Our visual examination of the site revealed that the stockpile is no longer present. In addition, at the time of our inspection, no standing water was observed north of the building.

The results of the Dames & Moore analyses of test pit soil samples in 1998 are as follows:

TEST PIT NO.	Arsenic Results (mg/kg)	Arsenic RAL[1] (mg/kg)	Chlordane Results (mg/kg)	Chlordane RAL (mg/kg)	2,4,5-TP Results (mg/kg)	2,4,5-TP RAL (mg/kg)
1	4.48	11	0.853	3.4	ND[2]	450
2	6.98	11	**4.35**	3.4	ND	450
3	6.6	11	0.193	3.4	ND	450
4	8.8	11	1.020	3.4	ND	450

Notes:

1 - RAL = Removal Action Level
2 - ND = non-detect
Bold and shaded values exceed the RAL

It may be seen that the only soil sample with a concentration of contaminants greater than the Removal Action Level ("RAL") in the approved Work Plan was that for chlordane in Test Pit 2. This test pit was located 38-feet north of the Huge' building and immediately south of the ditch located along the south side of the Terminal Railroad tracks. At this location, Dames & Moore located a 12-inch diameter clay tile T-shaped fitting. This fitting connected a north-south aligned pipe with an east-west aligned pipe along the rail line. The T-shaped fitting was located 1-foot below ground surface ("bgs"). Dames & Moore reports that the

soil was stained and a petroleum sheen was noted. They reported that the excavated soil was placed on plastic sheeting in a stockpile, sampled and covered. Since they also reported that the excavation was backfilled with crushed limestone gravel, it is assumed that this stockpiled material was disposed off-site.

PROPOSED REMOVAL ACTION

Removal Action Levels

The MDNR Any Use Soil Levels ("ASLs"), which were being used in 1998 as target cleanup objectives, were accepted by EPA to be protective of public health at the site. Since these values were previously approved, it is proposed that they continue to be used for this project. The respective ASLs for the chemicals of concern ("COCs"); i.e., arsenic, chlordane and 2,4,5-TP (Silvex) are 11, 3.4 and 450 mg/kg.

Removal Action

The only area requiring remediation at this time is in the vicinity of the 12-inch diameter clay pipe sewer discharging from the rear (north) of the Huge' building. All utilities in the area will be located prior to commencing the required subsurface excavation. After exposure of the 12-inch pipe, an opening will be cut into it, in order to perform dye testing. Dye will be introduced in the stormwater inlet located on the south side of the building to confirm that this sewer runs under the building and is, in fact, connected to the 12-clay pipe in question. The discharge location for the pipe parallel to the rail line also will be determined. In addition, dye testing will be performed to determine whether or not any of the floor drains and/or sumps within the Huge' building remain connected to this sewer line.

Dames & Moore had proposed replacing the 12-inch sewer from the building and the line parallel to the railroad tracks from a point north of the west Huge' property line to point north of the east Huge' property boundary. Based upon the results of the Dames & Moore test pitting, it does not appear that the line parallel to the railroad tracks requires replacement, unless the dye testing indicates that it is not intact in this area.

Therefore, following completion of the dye testing, a new pipe to replace the existing 12-inch line will be installed and connected from the sewer exiting the building to the pipe aligned parallel to the railroad tracks. Prior approval of the design and installation of this pipe will be obtained from the Metropolitan St. Louis Sewer District, if required. The material excavated for the installation of this pipe will be placed in a separate stockpile. As described below, the soils in this stockpile will be tested to determine whether or not the concentrations of the COCs are below the RALs. In addition, soil samples will be collected from the bottom of the trench and also analyzed for the COCs. When the COC concentrations are less than the RALs, the installation of the pipe will proceed.

Following completion of the installation of this new pipe, the existing pipe will be removed.

The clay pipe and surrounding soils will be excavated, loaded and transported to a permitted disposal facility. The selection of the facility will be dependent upon characterization of the pipe and soils. The extent of excavation will be based upon visual observation of the stained soils. The excavation will be sufficient to remove any impacted soils which may be around the pipe parallel to the railroad tracks. Additional test pits will be excavated 10-foot east and 10-foot west of the excavation to assure that all impacted soils along the pipe have been removed. One (1) soil sample for analysis for the COCs will be obtained from each of these test pits. If contamination remains, additional soil will be excavated along the pipe and the test pitting procedure repeated.

Based upon the analyses performed by Dames & Moore, it does not appear that the materials are hazardous; i.e., they can be disposed as a special waste at a landfill licensed to accept these materials. The pipe and soils will be excavated using a backhoe and stockpiled on plastic sheeting. Four (4) aliquots will be collected from within the stockpile (a minimum of 12-inches below the surface) and submitted to a laboratory using a chain of custody procedure. The laboratory will be requested to prepare a representative sample for analysis, using equal weight portions of each of the four (4) samples. The representative sample will be analyzed for both total and Toxic Characteristic Leaching Procedure ("TCLP") arsenic, chlordane and 2,4,5-TP. If the sample passes the TCLP test, the laboratory will be requested to analyze an additional sample, which will be collected at the same time as the four (4) discussed above, for the additional characteristics required by the landfill to determine whether or not they can accept the soils as a special waste. These analyses will include open cup flash point, paint filter and those additional tests required by the landfill.

Following excavation of the pipe and visually impacted soils, confirmation samples will be obtained to verify that the residual soils meet the RALs. Samples 10-foot center to center will be taken from the bottom of the excavation and one (1) sample from the downgradient wall. These samples will be submitted to the laboratory for analysis for total arsenic, chlordane and 2,4,5-TP. Should the results exceed the respective RAL, additional excavation and sampling will be performed until satisfactory results are achieved.

Following completion of the excavation, including verification, the stockpiled material will be loaded onto trucks and transported to the disposal facility. Each load will be accompanied by a manifest. Copies of these manifests will be included in a final Removal Action Report.

Following completion of the excavation and the new sewer installation, the excavations will be backfilled with clean imported fill material.

Following completion of the project, as indicated above, a Removal Action Report will be prepared.

STATEMENT OF QUALIFICATIONS

SHIFRIN & ASSOCIATES, INC.
230 S. Bemiston Avenue
St. Louis, Missouri 63105

Telephone: 314-725-5126
Fax: 314-862-0041

email: shifrin@shifrinandassociates.com
web page: www.shifrinandassociates.com

Firm and Key Personnel Resumes.

Name: Shifrin & Associates, Inc. (also S & E Remediation, Inc.)

Size: 4 employees including Office Manager

Description: Both firms were established in 1988. We started the firms to provide environmental engineering services, particularly Phase I and II Environmental Site Assessments, for real estate transfers. Since that time we have completed hundreds of assessments in Missouri, Illinois, Georgia, Iowa, Texas, Tennessee, California, Kansas, Michigan, Mississippi, Oklahoma, Oregon, New York, Pennsylvania and Florida for both large and small clients. These assessments have included industrial and commercial properties, multiple family projects, residential properties, as well as vacant and agricultural properties. We also have been retained to provide services on environmental cleanup programs and underground storage tank closures, including remediation.

Resumes: Walter G. Shifrin has forty-six (46) years of experience in sanitary/environmental engineering. He established Shifrin & Associates, Inc. and S & E Remediation, Inc. in 1988 and has worked full-time at the firm since its inception. During this time period, he has participated in hundreds of Phase I and II environmental site assessments, underground tank removal projects, prepared corrective action and/or remedial action plans and provided expert witness testimony on environmental matters. Mr. Shifrin is a registered engineer in Missouri and a number of other states. He received his education at the Massachusetts Institute of Technology - Bachelor of Science in Civil Engineering; Masters of Science in Sanitary Engineering.

Jeffrey T. Shifrin has fourteen (14) years of experience in providing environmental services. During the thirteen (13) years he has been employed at Shifrin & Associates, Inc., he has performed hundreds of Phase I and II environmental site assessments in accordance with the requirements of the American Society for Testing and Materials ("ASTM"). In addition, many assessments for the presence of asbestos containing materials have been completed. Mr. Shifrin is a Registered Environmental Property Assessor and a Certified AHERA Asbestos Inspector/Management Planner as well as a 40-hour trained OSHA Hazardous Waste Worker. He received his education at George Washington University - Bachelor of Arts.

Randall C. Spencer has fifteen (15) years of experience in performing various environmental services, primarily as a field technician and a health and safety technician. Mr. Spencer has been employed by Shifrin & Associates, Inc for 6 months. Mr. Spencer has provided oversight for Phase II Environmental Site Assessments and underground storage tank removal projects. He has extensive experience in the application of regulations relating to storage, transport and disposal of hazardous wastes. Mr. Spencer is a 40-hour trained OSHA Hazardous Waste Worker and a Certified AHERA Asbestos Inspector.

Capacity and Capability to Perform on Short Notice.

The firm has prided itself in its flexibility to serve clients and provide services on short notice. The ability to provide quick turn-around is enhanced by our relationships with drilling subcontractors and analytical laboratories.

Project Experience.

- The firm has completed 265 Phase I and 77 Phase II Environmental Site Assessments within the past 3 years. At the present time, the firm is the consultant for seven (7) sites, which are entered into the MDNR/Voluntary Cleanup Program. Certificates of Completion have been received for several other sites for which we provided consulting services. These projects required the completion of tasks similar to those included in the scope of work outlined in the RFQ.

- Performance of Phase I and Phase II Environmental Site Assessments primarily have been performed for clients and lending institutions in connection with property transfers. Therefore, the lead time to prepare these reports has been short and dictated by the closing dates for these transactions. Acceptance of these reports by the lending institutions and the ability of our clients to complete these transactions as planned speaks to our

quality of work and our ability to meet schedules. Many of our clients have retained us for subsequent or repeat assignments, another indication of our ability to perform.

- Nearly all of our engagements to prepare Phase I Environmental Site Assessment reports have a 3 to 4 week completion time requirement. Many of these assignments have been completed in 1 to 2 weeks. We also have completed certain Phase II investigations within the shorter time frame indicated above.

- Numerous underground storage tank closures, including soil remediation, have been completed by the firm. The firm also has remediated sites contaminated with dry cleaning solvents and other chemicals.

References.

We have performed environmental engineering services within the past two (2) years for the following references:

Mr. George K. Capps, President
Capital Land Company
11850 Studt Avenue
St. Louis, Missouri 63141
314-991-8900

Mr. Jim Otis
Otis & Clark Properties
1850 Craigshire Drive
St. Louis, Missouri 63146
314-434-4004

Mr. Henry W. Dubinsky, President
Waterway Gas & Wash
727 Goddard Avenue
Chesterfield, Missouri 63005
636-537-1111